

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
RS FIT NW LLC,	)	
	)	Case No. 20-11568 (KBO)
Debtor.	)	
	)	(Jointly Administered)
	)	
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24 HOUR FITNESS WORLDWIDE, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
CONTINENTAL CASUALTY COMPANY;	)	Adv. Pro. No. 20-51051 (KBO)
ENDURANCE AMERICAN SPECIALTY	)	
INSURANCE COMPANY; STARR SURPLUS	)	
LINES INSURANCE COMPANY; ALLIANZ	)	
GLOBAL RISKS US INSURANCE COMPANY;	)	
LIBERTY MUTUAL INSURANCE COMPANY;	)	
BEAZLEY-LLOYD'S SYNDICATES 2623/623;	)	
ALLIED WORLD NATIONAL ASSURANCE	)	
COMPANY; QBE SPECIALTY INSURANCE	)	
COMPANY; and GENERAL SECURITY	)	
INDEMNITY COMPANY OF ARIZONA,	)	
	)	
Defendants.	)	
	)	
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**PROPERTY INSURER DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND  
INCORPORATED MEMORANDUM OF LAW**

**EXHIBIT A-11**

*Email from Melanie Radovich to Nicole Rodriguez, Jeremy Gottlieb, Matt Piro,  
Chris Schmidt, Kristin Smith, Charles Huff, and Andras Dallos  
RE: emergency deep clean question (Deposition of Jeremy Gottlieb, Exhibit 3)  
24HF\_Production\_0151885-24HF\_Production\_0151886*

## Message

**From:** Melanie Radovich [mradovich@24hourfit.com]  
**Sent:** 3/12/2020 6:15:14 PM  
**To:** Nicole Rodriguez [nrodriguez@24hourfit.com]; Jeremy Gottlieb [JGottlieb@24hourfit.com]  
**CC:** Matt Piro [MPiro@24hourfit.com]; Chris Schmidt [cschmidt@24hourfit.com]; Kristin Smith [krsmith@24hourfit.com]; Charles Huff [chuff@24hourfit.com]; Andras Dallos [adallos@24hourfit.com]  
**Subject:** RE: emergency deep clean question  
**Attachments:** COVID19\_SOW.pdf

Hi all,

Attached is the COVID-19 Scope of Work.

Thanks,  
 Melanie

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**From:** Nicole Rodriguez <nrodriguez@24hourfit.com>  
**Sent:** Thursday, March 12, 2020 9:18 AM  
**To:** Jeremy Gottlieb <JGottlieb@24hourfit.com>; Melanie Radovich <mradovich@24hourfit.com>  
**Cc:** Matt Piro <MPiro@24hourfit.com>; Chris Schmidt <cschmidt@24hourfit.com>; Kristin Smith <krsmith@24hourfit.com>; Charles Huff <chuff@24hourfit.com>; Andras Dallos <adallos@24hourfit.com>  
**Subject:** RE: emergency deep clean question

Hi Team! I am OOO today and tomorrow so I am adding Melanie for support with all KBS items.

Below are the service levels KBS sent us, Mel is working to get them into a process document, she will send it once its complete.

Below are the SOW for each of the coronavirus levels

Level 2- **Descriptions:** Enhance cleaning services disinfecting common touch points

1. Door Knobs/handles	6. Microwave buttons/handles	11. Light Switches/cover plates	16. Paper towel/toilet tissue dispensers
2. Public Phones	7. Television remote controls	12. Elevator call buttons/cover plates	17. Checkout Stands, Customer Return Desk
3. Door Push Plates	8. Copy Machin buttons	13. Time clocks	18. Employee Recruiting Stations, other Service desks
4. Refrigerator handles	9. Stair railings	14. Common area filing cabinets	19. ATM Machines, Shopping carts
5. Vending Machine Buttons	10. Breakrooms tables, chairs & counters	15. Waiting area furniture (non-upholstered)	20. Shower/locker rooms, food areas

Level 3- Deep Cleaning

- Start with dry soil removal; dusting and sweeping.
- Vacuum all carpet, flooring, ledges, vents, upholstered furniture, etc.
- Remove all wet trash, and disposable cleaning towels into a biohazard red bag.
- Using Virex II (or equivalent) in Use Solution or comparable chemical RTU clean and disinfect all phones, desks, tables, door knobs, push plates, handles, railings, restroom fixtures, counters, stalls, partitions, light switches, bandit barriers, teller areas, check writing stands, entry doors,

**EXHIBIT**  
 EXHIBIT-3  
 JEREMY GOTTLIEB  
 A.0597  
 06/17/2022

handicap entry buttons, non-upholstered chair parts, exterior of trash cans, floors, ATM, night depository, drive up windows, drive up stands, kitchen appliances, etc.

- Using the hot water portable extractor, and Envirox H2Orange2 (or equivalent) complete a simple extraction of all upholstered furniture. Follow cleaning with an application of Biocharge (or equivalent).

- Clean and disinfect all tools and equipment.

- Remove all of our equipment and chemicals from the facility.

- The Site Coordinator walks the building to check for any left behind equipment or chemicals.

- The Site Coordinator fills out the leave behind form, if any, and completes the work order, notifies the Pandemic Coordinator of site completion.

Level 4- Confirmed Coronavirus

- Will be the Level 2 and 3 SOW.

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**From:** Jeremy Gottlieb

**Sent:** Thursday, March 12, 2020 6:35 AM

**To:** Nicole Rodriguez <nrodriguez@24hourfit.com>

**Cc:** Matt Piro <MPiro@24hourfit.com>; Chris Schmidt <cschmidt@24hourfit.com>; Kristin Smith <krsmith@24hourfit.com>; Charles Huff <chuff@24hourfit.com>; Andras Dallos <adallos@24hourfit.com>

**Subject:** emergency deep clean question

Nicole – do we have the specs on what an emergency deep clean by KBS includes? We need to be prepared to respond should there be COVID19 virus at one of our clubs. Curious whether KBS has the specific response as would be required by CDC. CC to Charles/Andras in case we need to reach out to Northstar / other recovery firm under MSA based on Ops response.

A.0598